

OCT 07 2020

MARK K. FLORES  
Crane Flores LLP  
15 West Carrillo Street, Suite 310  
Santa Barbara, California 93101  
Tel: (805) 564-8181  
Fax: (805) 456-4433  
[mkflores@cflawyers.com](mailto:mkflores@cflawyers.com)

Attorney for Plaintiff(s), Pardeep Gharu

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF VENTURA

Pardeep Gharu,

Plaintiff(s),

vs.

Kelli Brooke Dunkin,

and DOES 1 through 100

Defendant(s)

Case No.:

**COMPLAINT FOR DAMAGES  
FOR NEGLIGENCE AND NEGLIGENCE  
PER SE**

**DEMAND FOR JURY TRIAL**

COMES NOW the plaintiff, Pardeep Gharu, and for the causes of action against the defendants, and each of them, complains and alleges as follows:

**FIRST CAUSE OF ACTION**

(For Negligence Against Defendants Kelli Brooke Dunkin and DOES 1 through 100, inclusive)

1. The true names and capacities of the defendants, DOES 1 through 100, inclusive, whether individual, corporate, associate or otherwise, are not known to plaintiff, who therefore sues said defendants by such fictitious names and plaintiff will ask leave of court to amend this complaint to show their true names and capacities when the same have been ascertained. Plaintiff is informed and believes and thereon alleges that each of the defendants designated herein as a DOE is legally responsible in some manner for the events and happenings referred to herein and negligently caused the injuries and damages to the plaintiff as herein alleged.

1           2.       At all times herein mentioned, each defendant was the agent and employee of  
2 each of the remaining defendants, and in doing the things hereinafter mentioned each defendant  
3 was acting within the course and scope of his employment and authority as such agent and  
4 employee and with the consent of his co-defendants.

5  
6           3.       The negligence and carelessness of each defendant combined and cooperated  
7 with the negligence and carelessness of each of the remaining defendants to cause the below  
8 described incident. Plaintiff is in the class of persons that the California Vehicle Code is  
9 intended to protect and plaintiff is informed and believes that defendants' conduct was in  
10 violation of applicable vehicle codes and that said defendants' violation of said codes makes  
11 defendants' conduct negligent per se.

12  
13           4.       At all times herein mentioned, the defendants Kelli Brooke Dunkin and/or DOES  
14 1 through 50 and each of them, were the owners of a certain vehicle (hereinafter referred to as  
15 "defendants' vehicle"), and at all times herein mentioned, the defendants, Kelli Brooke Dunkin  
16 and/or DOES 51 through 100, were operating and/or using said vehicle with the consent and  
17 permission of its owners, and each of them. Defendants Kelli Brooke Dunkin and/or DOES 1  
18 through 50 and each of them, owners of said vehicle are subject to liability pursuant to Vehicle  
19 Code Section 17150.

20  
21           5.       On or about 10/22/2019, on Oxnard Boulevard at or near the 101 freeway off  
22 ramp, City of Oxnard in County Judicial District VENTURA, State of California, defendants,  
23 and each of them, so negligently, carelessly owned, operated, maintained, controlled, and  
24 entrusted defendants' vehicle, so as to cause defendants' vehicle to collide with and strike  
25 plaintiff's vehicle and causing the injuries and damages herein after set forth.

26  
27           6.       Plaintiff is further informed and believes that the conduct of defendants Kelli  
28 Brooke Dunkin and Does 1 through 50, and each of them, as described above, was in violation

1 of California Vehicle Code Section 22350. Defendants' violation of Vehicle Code Section  
2 22350 was such that it proximately caused the injuries to plaintiff as set forth herein above.  
3 Plaintiff is in the class of persons for whose protection California Vehicle Code Section 22350  
4 was adopted, and the injuries to plaintiff resulted from an occurrence of the nature which  
5 California Vehicle Code Section 22350 was designed to prevent.  
6

7 7. As a proximate result of the negligence and/or violations of applicable vehicle  
8 code sections by the defendants, and each of them, plaintiff Pardeep Gharu was hurt and injured  
9 in plaintiff's health, strength, and activity, sustaining injuries to plaintiff's body and injuries to  
10 plaintiff's nervous system and person, all of which said injuries caused and continue to cause  
11 plaintiff great mental, physical, and nervous pain and suffering. Plaintiff is informed and  
12 believes and thereby alleges that said injuries will result in some permanent disability to  
13 plaintiff, all to plaintiff's general damage in an amount in excess of the minimum jurisdictional  
14 limits of this court.  
15

16 8. As a further direct and proximate result of the negligence and/or violations of  
17 applicable vehicle code sections by the defendants, and each of them, as aforesaid, plaintiff has  
18 incurred and will in the future incur expenses for surgery, hospitalization, examination, care,  
19 and treatment of plaintiff's injuries, the exact nature and extent of which are unknown to  
20 plaintiff at this time and plaintiff will ask leave of court to amend the complaint according to  
21 proof when the same are ascertained at trial.  
22

23 9. As a further direct and proximate result of the negligence and/or violations of  
24 applicable vehicle code sections by the defendants, and each of them, as aforesaid, plaintiff will  
25 be unable to pursue plaintiff's vocation and has therefore, suffered and will suffer in the future,  
26 a loss of earnings and earning capacity, the exact amount of which is unknown to plaintiff at  
27 this time, and plaintiff will ask leave of court to amend the complaint according to proof when  
28 the same are ascertained at trial.

1           10.     As a further direct and proximate result of the negligence and carelessness of the  
2 defendants, and each of them, as aforesaid, plaintiff has suffered **property** (vehicle) damage and  
3 related expenses, the exact amount of which is unknown to plaintiff at this time, and plaintiff  
4 will ask leave of court to amend the complaint according to proof when the same are ascertained  
5 at trial.

6           WHEREFORE, plaintiff, Pardeep Gharu, prays for judgment against the defendants, and  
7 each of them, as follows:

8           1.     For general damages in an amount in excess of the minimum jurisdictional limits  
9 of this court;

10          2.     For such loss of earnings and earning capacity according to proof;

11          3.     For the reasonable value of such medical expenses, x-rays, laboratory  
12 procedures, hospitalization, nursing care, and attention and drugs and sundries, according to  
13 proof;

14          4.     For interest on plaintiff's damages as allowed by law;

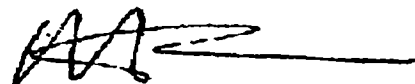
15          5.     For costs of suit incurred herein; and,

16          6.     For such other and further relief as to the court may deem just and proper.

17                   **DEMAND FOR JURY TRIAL**

18          Plaintiff demands a trial by jury in this action.

19          Dated: August 24, 2020



MARK K. FLORES Crane Flores  
LLP  
Attorney for  
Pardeep Gharu